

Scott purportedly utilizes in this case.

4. UPS further challenges the reliability of Dr. Scott's proposed opinions in this matter and what use, if any, such opinions will offer the jury where Dr. Scott admittedly used unsupported assumptions and chose to ignore, without explanation, specific facts pertinent to Hall's education, past wages, past financial history, and potential earnings known to the parties in this litigation in formulating those opinions.

5. UPS submits that in light of the speculative and conclusory nature of Dr. Scott's opinions, the inferential leaps made to arrive at his assumptions and subsequent opinions, Dr. Scott's proposed opinions/testimony will not assist the trier of fact.

6. In further support of this Motion, UPS attaches the following:

Exhibit "1" – Report of Dr. Ralph D. Scott

Exhibit "2" – Deposition of Dr. Ralph D. Scott (excerpts)

Exhibit "3" - Hall college transcripts

WHEREFORE, PREMISES CONSIDERED, for the reasons set forth herein and in the Memorandum in support of this Motion, UPS requests that the Court enter an Order excluding the proposed expert testimony of Dr. Scott, and further requests all additional and further relief the Court deems appropriate.

Respectfully submitted, this the 2nd day of February, 2018.

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CERTIFICATE OF SERVICE

I hereby certify that a Notice of Service concerning the foregoing pleading was filed via the Court's CM/ECF system, which will electronically transmit a copy of said pleading to all counsel of record. In addition, a copy of this pleading has been forwarded to counsel below via electronic mail:

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This the 2nd day of February, 2018.

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